

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

)	Case No. 13-04227-W
Frank Scott Dabney and)	
Kathryn Harrelle Dabney)	
)	Chapter 13
)	
)	
Debtor.)	
_____)	

ANSWER TO MOTION FOR RELIEF FROM STAY

The Debtor in this matter, by and through the undersigned counsel, answers the Motion To Modify Stay of Specialized Loan Servicing, LLC (hereinafter referred to as “Movant”) as follows:

1. Debtors deny all the allegations contained in Movant’s Motion unless specifically admitted hereafter.
2. Debtors are informed and believe that Movant is adequately protected pursuant to the terms of the Chapter 13 Plan and should not be entitled to relief from the automatic stay.
3. The Debtors are behind on payments due on this loan, debtors request an agreement allowing time to catch up on payments.

WHEREFORE, the Debtors pray that the Motion be dismissed, that they be reimbursed their costs and attorney’s fees associated with the defense of this Motion, and for such other and further relief as this Court may deem just and proper.

Respectfully submitted.

MOSS & ASSOCIATES, ATTORNEYS P.A.

By: /s / Heather S. Bailey

Heather S. Bailey

Federal I.D. No 11592

816 Elmwood Avenue

Columbia, South Carolina 29201

(803) 933-0202

Attorney for the Debtor

Columbia, South Carolina

July 22, 2014

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Certification of Facts

In the above-entitled proceeding, in which relief is sought by Specialized Loan Servicing, LLC from the automatic stay provided by 11 U.S.C. § 362, I do hereby certify to the best of my knowledge the following .:

1. Nature of Movant's Interest:

Secured

2. Brief Description of Security Agreement:

See Note and Mortgage Attached to Movant's Motion.

3. Description of Property Encumbered by Stay:

1844 Chelwood Cir. Charleston, SC 29407

4. Basis for Relief.

None. Movant is adequately protected under the terms of the Chapter 13 Plan.

5. Prior Adjudication by Others Courts, copy attached

N/A

6. Valuation of Property, copy of Valuation attached:

Fair Market Value	\$215,000.00
Liens	\$322,964.31

Basis for Valuation	Tax Appraisal
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Net Equity	-0-
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7. Amount of Debtor's Estimated Equity: -0-

8. Month and Year in which First Direct Post-petition Payment Came Due to Movant:

9. (A) for Movant/Lienholder: List or attach a list of all post petition payments received directly from debtor(s), clearly showing date received, amount, and month and year for which each such payment was applied: N/A

(B) For Objecting Party: List or attach a list of all post-petition payments included in the Movants list form (a) above which objection party disputes as having been made. Attach written proof of such payment(s) or a statement as to why such proof is not available at the time of filing this objection.

10. Month and Year for Which Post-petition Account of Debtor(s) is Due as of the Date of this Motion.

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on today's date, I served, on the persons and addresses below, by First Class Mail, postage prepaid, Debtor's Answer to Motion for Relief of Stay and Debtor's Certification of Facts.

Lawrence W. Johnson, Jr., Esq.
P.O. Box 883
Columbia, SC 29202
Attorney for Movant

James Wyman
PO Box 997
Mt. Pleasant, SC 29465
Chapter 13 Trustee

MOSS & ASSOCIATES, P.A.

By: /s/Stanley Rouse
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